



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
LANSING

GRETCHEN WHITMER  
GOVERNOR

ELIZABETH HERTEL  
DIRECTOR

February 24, 2021

The Honorable Steven Johnson  
Michigan House of Representatives  
P.O. Box 30014  
Lansing, MI 48909

Dear Representative Johnson:

I am writing to you today regarding your request for the Michigan Department of Health and Human Services (MDHHS) to testify before the House Oversight committee regarding COVID-19 nursing home policies, specifically regarding how deaths are accounted for. We appreciate the committee's interest in the issue and spent significant time during the last legislative session discussing this issue before numerous committees including the Joint Select Committee on the COVID-19 pandemic.

MDHHS has consistently implemented the most accurate reporting protocols with the goal of maintaining quality death data. The collection of accurate and complete data has been critical to the department's efforts to direct resources where they are needed most.

Governor Whitmer signed Executive Order 2020-50 on April 15, 2020, which established requirements for all state long-term care facilities to report to MDHHS, "all presumed positive cases in the facility together with any additional data required under DHHS guidance". Beginning on April 20, 2020, MDHHS provided guidance regarding the daily report for the skilled nursing facilities part of the department's EMResource system. The state's decision to require reporting came three weeks before the federal government's decision to do so.

At the recommendation of the Michigan Nursing Home COVID-19 Preparedness Task Force, MDHHS reissued its guidance to align with the May 8, 2020 federal Centers for Disease Control and Prevention (CDC) and Centers for Medicare and Medicaid Services (CMS) requirements for skilled nursing facilities. After these new federal requirements were released, MDHHS moved immediately to make system changes to ensure consistency of reporting and launched the new reporting module on May 22, 2020. This update allowed for MDHHS to collect both current and cumulative case and death counts by facility and allow for facilities to report just once to EMResource to satisfy both the MDHHS and federal reporting requirements thus reducing the burden on these providers.

The Honorable Steven Johnson  
February 24, 2021  
Page 2

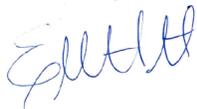
The federal government (CMS and CDC) requires that nursing facilities report the number of residents with suspected or laboratory positive COVID-19 who died in the facility or another location. Facilities are expected to track this through communication with resident's family, the hospital, and/or local health department for any residents who were transferred to the hospital and expected to return to the facility. This process captures all but the rarest instances of nursing home transmission.

The national definition for COVID-19 death that Michigan adopted for weekly reporting is as follows: "Defined by the National Healthcare Safety Network as residents who died from SARS-CoV2 (COVID-19) related complications and includes resident deaths in the facility and in other locations, such as an acute care facility, in which the resident with COVID-19 was transferred to receive treatment. Residents discharged from the facility are excluded from the count."

To confirm the quality and accuracy of our data, MDHHS engaged in a robust point in time data validation project including working with the Institute of Health Policy at Michigan State University to support additional validation exercises that run longitudinal views on the data. When a facility is flagged for a validation concern, MDHHS works with the Regional Health Care Coalition to conduct outreach and technical assistance to the facility. Facilities are provided the opportunity to correct entry errors identified during the validation process prior to including on the MDHHS long-term care website with additional correction sent to the CDC in support of required federal reporting.

During the development of PA 231 of 2020, MDHHS worked with legislative staff to ensure that the metrics and data surrounding nursing homes that were of interest to the Legislature were publicly available. It is my belief that Michigan has done an exemplary job of collecting, tracking, and validating data throughout the COVID-19 pandemic and it cannot be overstated the commitment by our staff and partners in ensuring that the data is correct. Again, I appreciate your interest in this topic and look forward to any additional questions you may have.

Sincerely,



Elizabeth Hertel  
Director

EH:es

c: Members of the House Oversight Committee